

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|---------------------------------------|---|---------------------------|
| INSULATORS AND ASBESTOS WORKERS |) | |
| LOCAL NO. 14 PENSION FUND |) | |
| |) | |
| Plaintiff, |) | |
| -against- |) | Case No.: 07-cv-00416-GMS |
| |) | |
| GEORGE W. BUCKLEY, LINDA G. |) | |
| ALVARADO, VANCE D. COFFMAN, |) | |
| MICHAEL L. ESKEW, W. JAMES FARRELL, |) | |
| HERBERT L. HENKEL, EDWARD M. LIDDY, |) | |
| ROBERT S. MORRISON, AULANA L. PETERS, |) | |
| ROZANNE L. RIDGEWAY, PATRICK D. |) | |
| CAMPBELL, MOE S. NOZARI, FREDERICK |) | |
| J. PALENSKY, RICHARD F. ZIEGLER, |) | |
| |) | |
| Defendants, |) | |
| -and- |) | |
| |) | |
| 3M COMPANY, |) | |
| |) | |
| Nominal Defendant. |) | |

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

RIGRODSKY & LONG, P.A.
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Brian D. Long (#4347)
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Attorneys for Plaintiff

Of Counsel:

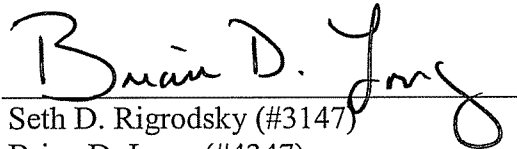
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Plaintiff hereby moves for summary judgment enjoining payments under the 3M Executive Annual Incentive Plan. The grounds for this motion are that 3M's proxy statement for the annual meeting of stockholders on May 8, 2007 is materially incomplete, inadequate, false, and misleading under *Shaev v. Saper*, 320 F.3d 373 (3rd Cir. 2003), as demonstrated in the accompanying Declaration of A. Arnold Gershon, dated August 10, 2007, and the supporting memorandum.

Dated: August 21, 2007

RIGRODSKY & LONG, P.A.

By: 

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CERTIFICATE OF SERVICE

I, Brian D. Long, hereby certify that on this 21st day of August, 2007, that I have caused foregoing Plaintiff's Motion for Summary Judgment to be filed via the CM/ECF System and served via e-mail upon the following counsel.

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